

1 I, Nathan John Fraim, declare as follows:
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3 1. I am over the age of 18. If called upon to testify, I could and would testify competently as
4 to the facts set forth in this declaration.

5 2. I am a Caucasian male. I was employed by Tesla, Inc. ("Tesla") at the Fremont, California
6 Tesla Factory through the Staffing Agency Volt Workforce Solutions from January 30, 2017,
7 until July 31, 2017, when I quit voluntarily.

8 3. My job title at Tesla was Production Associate, and I worked on the production floor. I
9 was stationed on the bottom floor near B23 and B27. My primary job duty involved removing
10 products from boxes and delivering those products to the production line. My direct supervisor
11 was Leigh High Gomez.

12 4. On April 28, 2017, I saw the following words handwritten on a pamphlet that was posted
13 on a bathroom stall door: "White Power Nigger!" I took a photograph of the graffiti with my cell
14 phone, which I texted to my supervisor Mr. Gomez that same day. A true and correct copy of that
15 photograph is attached hereto as Exhibit 1.

16 5. To my knowledge, Mr. Gomez took no steps to investigate the incident, and I was never
17 contacted again by anyone at Tesla concerning my report to Mr. Gomez.

18 6. While I was working at Tesla, I frequently heard co-workers who were not African-
19 American casually using the word "Nigga." This term was not directed at me, but I found it very
20 offensive, as no one should have to hear that kind of language at work.

21
22 I declare under the penalty of perjury that the foregoing is true and correct.
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24
25 DATED: November 16, 2017


26 By: 
27 Nathan John Fraim
28

EXHIBIT 1

